

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

Robert Manchel, Esq.  
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Attorney for debtor(s)  
RM-1141

In Re:

Lindsey Watson

Case No. 23-18441ABA

Judge:

Chapter 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**

**CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

**X TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following **(choose one)**:

1. \_\_\_\_\_ Motion for Relief from the Automatic Stay filed by \_\_\_\_\_, creditor. A hearing has been scheduled for \_\_\_\_\_ at \_\_\_\_\_ am.

OR

\_\_\_\_\_ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for \_\_\_\_\_, at 9:00am.

OR

\_\_\_\_\_ Certification of Default filed by \_\_\_\_\_, creditor. I am requesting that a hearing be scheduled on this matter.

OR

X Certification of Default filed by Standing Chapter 13 Trustee.

I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

\_\_\_\_\_ Payments have been made in the amount of \$\_\_\_\_\_, but have not been accounted for. Documentation in support is attached hereto.

\_\_\_\_\_ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

X Other: My bankruptcy plan was confirmed on May 9, 2024 for \$820.00 monthly. I could not make my June payment as I was in the hospital with an illness. On July 1, 2024, the trustee received my \$820.00 payment as reflected on the National Data Center Website. Therefore, I owed one payment of \$820.00. I just made a payment on July 22, 2024, that brings my plan current. Please allow me to continue with my case.

I, Robert Manchel, Esq., advise that my client Lindsey Watson agrees to the terms reflected above. However, I have not yet received her signed response. Therefore, I am signing this certification on her behalf. I will submit the debtor's responsive certification when I receive the same.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 7/24/24

/s/Robert Manchel, Esq.

Robert Manchel, Esq., Attorney for the Debtor